

BURKE, WILLIAMS & SORENSEN, LLP
Richard J. Reynolds, Bar No. 89911
rreynolds@bwsllaw.com
Rafael R. Garcia-Salgado, Bar No. 283230
rgarcia@bwsllaw.com
1851 East First Street
Suite 1550
Santa Ana, CA 92705-4067
Telephone: 949.863.3363
Facsimile: 949.863.3350

Attorneys for Defendants
SPECIAL DEFAULT SERVICES, INC.; TRINITY
FINANCIAL SERVICES, LLC; and NEWPORT
BEACH HOLDINGS, LLC

UNITED STATES BANKRUPTCY COURT

NORTHERN DISTRICT OF CALIFORNIA

CECILIA MANGAOANG,
Debtor,

Case No. 18-52245-MEH

Adv. No. 18-05062

Chapter Number: 13

**UNILATERAL STATUS CONFERENCE
STATEMENT**

DATE: February 11, 2019

TIME: 10:00 a.m.

CTRM: 3020

CECILIA MANGAOANG,
Plaintiff,

Vs.

SPECIAL DEFAULT SERVICES, INC.;
TRINITY FINANCIAL SERVICES, LLC;
NEWPORT BEACH HOLDINGS, LLC;
Does 1-10, inclusive

Defendants.

Defendants, Special Default Services, Inc. ("SDS"), Trinity Financial Services, LLC
("Trinity"), and Newport Beach Holdings, LLC ("NBH"), by and through their counsel, hereby

1 submits is Status Conference Statement regarding Debtor's pending *First Amended Verified*
2 *Adversary Complaint* [Docket No. 7] (the "LAM Motion").

3
4 1. On December 4, 2018, the Plaintiff, Cecilia Mangaoang (the "Plaintiff") filed her
5 original Verified Adversary Complaint [Docket No. 1].

6 2. On December 4, 2018, the Court issued its Summons on NBH, SDS, and Trinity
7 [Docket No. 3].

8 3. On December 7, 2018, the Plaintiff filed her First Amended Verified Adversary
9 Complaint [Docket No. 7].

10 4. On December 13, 2018, the Plaintiff filed an Amended Summons on NBH, SDS,
11 Trinity, and Naiman Law Group ("Naiman") [Docket No. 8].

12 5. On January 17, 2019, SDS filed its Answer to Complaint [Docket No. 20].

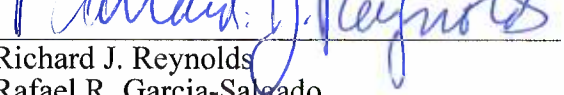
13 6. On January 17, 2019, Trinity filed its Answer to Complaint [Docket No. 21].

14 7. On January 17, 2019, NBH filed its Answer to Complaint [Docket No. 22].

15 8. Plaintiff has not initiated a Discovery Conference.

16
17 Dated: February 4, 2019

BURKE, WILLIAMS & SORESENSEN, LLP

18
19 By: 
20 Richard J. Reynolds
21 Rafael R. Garcia-Salgado
22 Attorneys for Defendants
23 SPECIAL DEFAULT SERVICES, INC.;
24 TRINITY FINANCIAL SERVICES, LLC;
25 and NEWPORT BEACH HOLDINGS,
26 LLC
27
28

1 **PROOF OF SERVICE**

2 I, Johnnelle Gomez, declare:

3 I am a citizen of the United States and employed in Orange County, California. I am over
4 the age of eighteen years and not a party to the within-entitled action. My business address is
1851 East First Street, Suite 1550, Santa Ana, California 92705-4067.

5 On **February 5, 2019**, I electronically filed the attached document:

6 **UNILATERAL STATUS CONFERENCE STATEMENT**

7 with the Clerk of the court using the CM/ECF system which will then send a notification of such
8 filing to the following:

- 9
 - **Rafael Ramon Garcia-Salgado** rgarcia@bwsllaw.com, bantle@bwsllaw.com
 - **Richard J. Reynolds** rreynolds@bwsllaw.com, psoeffner@bwsllaw.com

10 And I hereby do certify that I have mailed by United States Postal Service the document to the
11 following non CM/ECF participants:

12 Debtor:
13 Cecilia Mangaoang
14 2901 Capewood Lane
15 San Jose, CA 95132

Judge:
Honorable M. Elaine Hammond
United States Courthouse, Room 3035
280 South First Street
San Jose, CA 95113-3099

16 I declare that I am employed in the office of a member of the bar of this court at whose
17 direction the service was made.

18 Executed on **February 5, 2019**, at Santa Ana, California.

19
20
21
22 /s/ Johnnelle Gomez
23 Johnnelle Gomez
24
25
26
27
28